

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Case No: 5:12-cv-00069-H

ROSE LORENZO, and all others similarly  
situated,

Plaintiff,

v.

PRIME COMMUNICATIONS, L.P., a  
Texas General Partnership,

Defendant.

**PETITION FOR AWARD OF**  
**ATTORNEYS' FEES AND COSTS IN**  
**ACCORDANCE WITH RULE 68(a)**  
**OFFERS OF JUDGMENT**

Plaintiffs Ashely Barnette, Briana Cameron, Savannah Canty-Perkins, Robert Cooper, Alan Corrado, David Davis, John Eastman, Robert Floyd, David Horton, Jr., Rose Lorenzo, Cassidi Manary, Paul Monaghan, Jacob Robinson, Courtney Smith, Glenn Sudhop, Brenton Tate, Alejandra Vasquez, Yaser Warrich, Joseph Yanda, London Donthnier (Stewart), Imran Ahmad, Brett Bashore, Glen Britton, Anthony Cerda, Matthew Chamberlain, Cody Coe, Aleita Drake, Amy Evans, Mahmoud Gaballa, William Halstead, Stanley Jones, Mary Rohen, Richard E. Sullivan, Brett Thompson, Christopher Bishop, Jared Costner, Eric Dixon, Matthew Farkas, Andres Franky, Carmie Harrall, Timothy Hephner, Taylor Johnson, Jeremy Manalo, Anthony Rowell, Ashley Ruben, Krystle Schweizer, Barbara Vuocolo-Quinn, Brad Weiner, Rebecca Willoughby, the forty-nine (49) Plaintiffs on whose behalves judgment as to all asserted FLSA claims has been entered, [DE 402-421, 423-435, 437-451 & 454], in accordance with accepted Rule 68 Offers of Judgment and pursuant to Rule 54 of the Federal Rules of Civil Procedure, move this Court for an award of reasonable attorneys' fees in the amount of \$444,041.49 and costs in

the amount of \$13,956.43 on the grounds set forth in their Memorandum in Support and related documents, filed contemporaneously herewith:

**Dated:** February 2, 2018.

Respectfully submitted,

/s/ Stephen A. Dunn

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing PETITION FOR AWARD OF ATTORNEYS' FEES AND COSTS IN ACCORDANCE WITH RULE 68(a) OFFERS OF JUDGMENT with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

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This the 2<sup>nd</sup> day of February, 2018

/s/ S. Michael Dunn  
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